

Ryan Gile, Esq.
 rg@gilelawgroup.com
 Nevada Bar No. 8807
GILE LAW GROUP LTD.
 1180 N. Town Center Drive, Suite 100
 Las Vegas, NV 89144
 Tel. (702) 703-7288

Attorney for Plaintiff Donald Bakewell

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DONALD BAKEWELL,)	Case No. 2:22-cv-00911-JCM-DJA
)	
Plaintiff,)	
)	STIPULATION AND ORDER TO
v.)	EXTEND TIME TO RESPOND TO
)	MOTION TO DISMISS
STREAMING SOLUTIONS LLC,)	
)	(First Request)
Defendant.)	
)	
)	

Plaintiff Donald Bakewell (“Plaintiff”), by and through his counsel of record, and Defendant Streaming Solutions, LLC (“Defendant”), by and through its counsel of record, hereby stipulate to extend the time for Plaintiff to respond to Defendant’s Motion to Dismiss for Lack of Personal Jurisdiction (ECF No. 8) (the “Motion to Dismiss”) to September 26, 2022, in order to accommodate Plaintiff’s need for additional time to prepare its briefing as well as preexisting travel plans by the parties’ counsel.

Defendant’s Motion to Dismiss for Lack of Personal Jurisdiction (ECF No. 8) was filed on August 12, 2022, which makes the current deadline for filing a response to the Motion on August 26, 2022. Plaintiff requires additional time to prepare its response to the Motion. In addition, Plaintiff’s counsel is scheduled to be traveling out of the country beginning on August 28th through September 22nd and Defendant’s counsel is scheduled to be traveling out of the country beginning on September 11th through September 23rd. In order to accommodate Plaintiff’s request for additional time to prepare its response to the Motion and the subsequent overseas travel schedules of both parties’ counsel, the parties have stipulated and agreed to this extension of time.

For these reasons, the extension sought is supported by good cause and not for purposes of delay or any other bad faith purpose. This is the first request for an extension of time to respond to this Motion.

Accordingly, the deadline for Plaintiff to file its response to Defendant's Motion to Dismiss for Lack of Personal Jurisdiction shall be extended such that the new deadline for the response is September 26, 2022. The deadline for any reply thereto shall be October 3, 2022.

IT IS SO STIPULATED.

Dated: August 25, 2022

GILE LAW GROUP, LTD.

CARMAN COONEY FORBUSH PLLC

/s/ Ryan Gile

/s/ Sean D. Cooney

Ryan Gile, Esq.

Sean D. Cooney, Esq.

Nevada Bar No. 8807

NV Bar # 12945

rg@gilelawgroup.com

Adam C. Edwards, Esq.

1180 N. Town Center Drive, Suite 100

NV Bar # 15405

Las Vegas, Nevada 89144

4045 Spencer Street Suite A47

Tel. (702) 703-7288

Las Vegas, NV 89119

Telephone: (702) 421-0111

Facsimile: (702) 516-1033

service@ccfattorneys.com

Attorney for Plaintiff Donald Bakewell

*Attorneys for Defendant
Streaming Solutions, LLC*

IT IS SO ORDERED:



U.S. DISTRICT JUDGE

DATED: August 25, 2022

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF to all participants in the case who are registered CM/ECF users.

/s/ Ryan Gile
Employee, Gile Law Group Ltd.